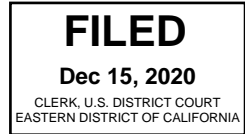


GLENN O'CONNOR, B-71820
Name and Prisoner/Booking Number
CALIF. HEALTH CARE FACILITY
Place of Confinement
PO BOX 32200
Mailing Address
STOCKTON, CA. 95213
City, State, Zip Code



(Failure to notify the Court of your change of address may result in dismissal of this action.)

IN THE UNITED STATES DISTRICT COURT
 FOR THE EASTERN DISTRICT OF CALIFORNIA

GLENN O'CONNOR)
(Full Name of Plaintiff) Plaintiff,)
 v.)
 (1) CDCR)
(Full Name of Defendant))
 (2) ALEX FARHAT)
 (3))
 (4))
 Defendant(s).)
☐ Check if there are additional Defendants and attach page 1-A listing them.

CASE NO. 2:20-cv-2479-CKD (PC)
 (To be supplied by the Clerk)

CIVIL RIGHTS COMPLAINT
 BY A PRISONER

☒ Original Complaint
☐ First Amended Complaint
☐ Second Amended Complaint

A. JURISDICTION

- This Court has jurisdiction over this action pursuant to:
☒ 28 U.S.C. § 1343(a); 42 U.S.C. § 1983
☐ 28 U.S.C. § 1331; Bivens v. Six Unknown Federal Narcotics Agents, 403 U.S. 388 (1971).
☐ Other: _____
- Institution/city where violation occurred: CHCF, STOCKTON, CA.

B. DEFENDANTS

1. Name of first Defendant: CDCR. The first Defendant is employed as:
IS A STATE AGENCY at _____
(Position and Title) (Institution)
2. Name of second Defendant: ALEX FARHAT. The second Defendant is employed as:
Physician & Surgeon at CHCF
(Position and Title) (Institution)
3. Name of third Defendant: _____. The third Defendant is employed as:
_____ at _____
(Position and Title) (Institution)
4. Name of fourth Defendant: _____. The fourth Defendant is employed as:
_____ at _____
(Position and Title) (Institution)

If you name more than four Defendants, answer the questions listed above for each additional Defendant on a separate page.

C. PREVIOUS LAWSUITS

1. Have you filed any other lawsuits while you were a prisoner? ☒ Yes ☐ No
2. If yes, how many lawsuits have you filed? 6. Describe the previous lawsuits:
 - a. First prior lawsuit:
 1. Parties: GLENN O'CONNOR v. VARIOUS CDCR STAFF NAMES NOW UNKNOWN
 2. Court and case number: UNKNOWN; CASE WAS FILED SOME 34 YEARS AGO.
 3. Result: (Was the case dismissed? Was it appealed? Is it still pending?)
dismissed for lack of prosecution
 - b. Second prior lawsuit:
 1. Parties: GLENN O'CONNOR v. W. PEREZ, et al
 2. Court and case number: US DIST. EASTERN DISTRICT, # 2:18-cv-01057 DB
 3. Result: (Was the case dismissed? Was it appealed? Is it still pending?)
PENDING
 - c. Third prior lawsuit:
 1. Parties: GLENN O'CONNOR v. CDCR
 2. Court and case number: US DIST. EASTERN DIST., # 2:19-cv-658 KJM KJM
 3. Result: (Was the case dismissed? Was it appealed? Is it still pending?)
PENDING

If you filed more than three lawsuits, answer the questions listed above for each additional lawsuit on a separate page.

Prior Lawsuits, continued

d) GLENN O'CONNOR V. PADGETT

US DISTRICT COURT, EASTERN DIST. OF CALIF.

CASE No. 2:19-CV-01926 DMC

STATUS: PENDING

e) GLENN O'CONNOR V. KABIR MATHARU, et al

US DISTRICT COURT, EASTERN DISTRICT OF CALIF.

CASE No. 2:19-CV-2368 DMC

STATUS: PENDING

f) GLENN O'CONNOR V. J. HOOKS, et al

US DISTRICT COURT, EASTERN DISTRICT OF CALIF.

CASE No. 2:20-CV-135 CKD

STATUS: PENDING

g) GLENN O'CONNOR V. CDCR

US DIST. COURT, EAST. DIST. CALIF.

CASE No. 2:19-CV-1867 WBS EFB

STATUS: VOLUNTARILY WITHDRAWN

(2a)

Complaint

D. CAUSE OF ACTION

CLAIM I

1. State the constitutional or other federal civil right that was violated: Eighth Amendment to the US Constitution
2. **Claim I.** Identify the issue involved. Check **only one**. State additional issues in separate claims.
- | | | | |
|--|---|---|--|
| <input type="checkbox"/> Basic necessities | <input type="checkbox"/> Mail | <input type="checkbox"/> Access to the court | <input checked="" type="checkbox"/> Medical care |
| <input type="checkbox"/> Disciplinary proceedings | <input type="checkbox"/> Property | <input type="checkbox"/> Exercise of religion | <input type="checkbox"/> Retaliation |
| <input type="checkbox"/> Excessive force by an officer | <input type="checkbox"/> Threat to safety | <input type="checkbox"/> Other: _____ | |
3. **Supporting Facts.** State as briefly as possible the FACTS supporting Claim I. Describe exactly what **each Defendant** did or did not do that violated your rights. State the facts clearly in your own words without citing legal authority or arguments.
- Please See CLAIM 1
- PLAINTIFF'S EYE DISEASE MAKES HIM PRINT LARGE - SO EVEN IF THE PAGE NUMBERS ARE HIGH, THEY CONTAIN LESS TEXT THAN MACHINE PREPARED DOCUMENTS.
- PLAINTIFF SUFFERS FROM PERIPHERAL NEUROPATHY WHICH MAKES IT VERY DIFFICULT TO HOLD A PEN OR TO PRINT LEGIBLY.
4. **Injury.** State how you were injured by the actions or inactions of the Defendant(s).
- PLEASE SEE CLAIM 1
5. **Administrative Remedies:**
- Are there any administrative remedies (grievance procedures or administrative appeals) available at your institution? ☒ Yes ☐ No
 - Did you submit a request for administrative relief on Claim I? ☒ Yes ☐ No
 - Did you appeal your request for relief on Claim I to the highest level? ☒ Yes ☐ No
 - If you did not submit or appeal a request for administrative relief at any level, briefly explain why you did not. _____

CLAIM II

1. State the constitutional or other federal civil right that was violated: 8th Amendment
Violations for all other claims

2. **Claim II.** Identify the issue involved. Check **only one**. State additional issues in separate claims.

- | | | | |
|--|---|---|--|
| <input type="checkbox"/> Basic necessities | <input type="checkbox"/> Mail | <input type="checkbox"/> Access to the court | <input checked="" type="checkbox"/> Medical care |
| <input type="checkbox"/> Disciplinary proceedings | <input type="checkbox"/> Property | <input type="checkbox"/> Exercise of religion | <input type="checkbox"/> Retaliation |
| <input type="checkbox"/> Excessive force by an officer | <input type="checkbox"/> Threat to safety | <input type="checkbox"/> Other: | |

3. **Supporting Facts.** State as briefly as possible the FACTS supporting Claim II. Describe exactly what **each Defendant** did or did not do that violated your rights. State the facts clearly in your own words without citing legal authority or arguments.

Plaintiff suffers from eye disease (myopia)
and finds it painful to try to write
in these lines.

All claims are written on the
attached pages.

4. **Injury.** State how you were injured by the actions or inactions of the Defendant(s).

5. **Administrative Remedies.**

- Are there any administrative remedies (grievance procedures or administrative appeals) available at your institution? ☒ Yes ☐ No
- Did you submit a request for administrative relief on Claim II? ☒ Yes ☐ No
- Did you appeal your request for relief on Claim II to the highest level? ☒ Yes ☐ No
- If you did not submit or appeal a request for administrative relief at any level, briefly explain why you did not. _____

CLAIM III

1. State the constitutional or other federal civil right that was violated: 8th Amendment
to US Constitution
2. **Claim III.** Identify the issue involved. Check **only one**. State additional issues in separate claims.
- | | | | |
|--|---|---|---------------------------------------|
| <input type="checkbox"/> Basic necessities | <input type="checkbox"/> Mail | <input type="checkbox"/> Access to the court | <input type="checkbox"/> Medical care |
| <input type="checkbox"/> Disciplinary proceedings | <input type="checkbox"/> Property | <input type="checkbox"/> Exercise of religion | <input type="checkbox"/> Retaliation |
| <input type="checkbox"/> Excessive force by an officer | <input type="checkbox"/> Threat to safety | <input type="checkbox"/> Other: _____ | |
3. **Supporting Facts.** State as briefly as possible the FACTS supporting Claim III. Describe exactly what **each Defendant** did or did not do that violated your rights. State the facts clearly in your own words without citing legal authority or arguments.
- please see previous page
4. **Injury.** State how you were injured by the actions or inactions of the Defendant(s).
5. **Administrative Remedies.**
- a. Are there any administrative remedies (grievance procedures or administrative appeals) available at your institution? ☒ Yes ☐ No
- b. Did you submit a request for administrative relief on Claim III? ☒ Yes ☐ No
- c. Did you appeal your request for relief on Claim III to the highest level? ☒ Yes ☐ No
- d. If you did not submit or appeal a request for administrative relief at any level, briefly explain why you did not. _____

If you assert more than three Claims, answer the questions listed above for each additional Claim on a separate page.

E. REQUEST FOR RELIEF

State the relief you are seeking:

*In each claim except claim I injunctive relief
prospective after screening) monetary
sums are mentioned.*

I declare under penalty of perjury that the foregoing is true and correct.

Executed on

12/11/20
DATE

Alan O'Connor
SIGNATURE OF PLAINTIFF

(Name and title of paralegal, legal assistant, or
other person who helped prepare this complaint)

(Signature of attorney, if any)

(Attorney's address & telephone number)

ADDITIONAL PAGES

All questions must be answered concisely in the proper space on the form. If you need more space you may attach more pages, but you are strongly encouraged to limit your complaint to twenty-five pages. If you attach additional pages, be sure to identify which section of the complaint is being continued and number all pages. Remember, there is no need to attach exhibits to your complaint.

OVERVIEW

Plaintiff is a convicted felon serving a sentence in the California Department of Corrections and Rehabilitation (CDCR).

Plaintiff is currently housed at the California Health Care Facility, located in Stockton, CA. (CHCF)

Plaintiff is a senior prisoner who suffers from a variety of medical conditions for which he has received treatments and protective services for many years, at many prisons.

Plaintiff suffers from sleep apnea, a potentially deadly condition if left untreated. The computerized Sleep Study conducted in 2014 evidenced plaintiff stopped breathing some 9 times per hour of sleep, and plaintiff was prescribed a Continuous Pressure Airway Device (CPAP machine) to save his life.

(7)

Complaint

1 Plaintiff suffers from Asthma / chronic
2 obstructive pulmonary disease overlap syndrome,
3 a potentially deadly combination of diseases
4 which have made plaintiff a high-risk
5 respiratory patient, and made him be
6 declared to be totally disabled by doctors at
7 several other prisons. Prisoners declared to be
8 totally disabled are not made to work.
9
10
11

12 To protect plaintiff from harm in the
13 often filthy, dangerous, unsanitary prisons
14 in California, plaintiff's doctors have historically
15 initiated or maintained a Laundry-list of
16 environmental and/or work restrictions on
17 plaintiff, such as:
18
19
20

21 Must not be exposed to pepper spray

22 must not be exposed to chemicals, fumes from
23 chemicals
24

25 Must not be exposed to dust or dusty environments.
26

27 Must not be housed in a dorm (Single-cell status)
28

(8)

Complaint

1 Must have continuous electrical power for his
2 CAP machine.

3
4 Must be housed in a facility not high-risk
5 for Valley Fever.
6

7 There are many more but for brevity, plaintiff
8 will list only these. At every prison, the
9 medical staff have initiated various restrictions
10 and they, along with the Totally Disabled Status
11 have acted to help protect plaintiff.
12
13
14

15 Plaintiff was diagnosed as hypersensitive to
16 chemicals in about 2016. Plaintiff's medical
17 chronos at every prison have specified plaintiff
18 must avoid chemicals, pepper spray, fumes and
19 even cold or hot temperatures.
20
21

22 Plaintiff's doctors have not yet been able
23 to diagnose some of the serious symptoms
24 plaintiff suffers from; plaintiff has seen
25 several specialists over the years and even
26
27
28

(9)

Complaint

1 now has been awaiting seeing an allergist
2 for all, or most of 2020. The covid crisis
3 has cancelled visits, even for medical care.
4

5 Plaintiff arrived at CHCF "for single-cell
6 housing" (intake chrono) and has been single-celled
7 through 2020.
8
9

10 Since arriving at CHCF, plaintiff has
11 required medically specialized housing (OTHU)
12 which provides higher levels of care than
13 plaintiff received elsewhere.
14
15
16

17 Plaintiff currently resides in a
18 special 1-man cell with air handling
19 capabilities to reduce any spread of
20 infection in the respiratory system.
21
22

23 Plaintiff remains on 24-hour a day
24 medical lockdown status.
25
26
27
28

(10)

Complaint

1 Plaintiff is housed in C2A housing unit,
2 where all the prisoners are single-celled due
3 to their medical, or mental health, condition.
4

5 Dr. Alex Farhat is the Assigned Primary
6 Care Physician (PCP) for all patient/prisoners
7 housed in C2A. C2A is deemed to be
8 "OHU", or an Outpatient Housing Unit
9 (medical) as opposed to general population
10 housing units.
11
12
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15

16 Dissatisfied with what he perceived as poor
17 medical care from Dr. Farhat, plaintiff filed
18 several Inmate grievances against him, and
19 the issues surrounding his medical care.
20
21
22

23 In retaliation, Dr. Farhat suddenly and
24 secretly changed plaintiff's status from
25 totally disabled to "Light duty."
26
27
28

(11)

Complaint

1 Plaintiff complained to Dr. Farhat that
2 it appeared that all of the previously issued
3 and maintained environmental and work
4 restrictions had been removed from
5 plaintiff's status and files. Dr. Farhat
6 refused to discuss the topic and left
7 the interview. Plaintiff received a dangerous job assignment.
8
9

10 Plaintiff filed a new Inmate Grievance
11 against Dr. Farhat for the above.
12
13

14 Dr. Farhat suddenly and secretly removed
15 plaintiff's single-cell status with no
16 explanation. Dorm living has ~~been~~ proven
17 to be harmful to plaintiff.
18

19 Plaintiff therefore files the following
20 claims:
21
22
23
24
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27
28

1 CLAIM I
2
3

4 Plaintiff sues the CDCR as it is the
5 proper respondent for the injunctive
6 relief plaintiff intends to seek after
7 screening by the court.
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(13)

Complaint

CLAIM II

Plaintiff sues defendant Alex Farhat in his individual capacity for violating plaintiff's rights to decent and adequate medical care under the Eighth Amendment to the United States Constitution.

Defendant Farhat refused to order plaintiff be permitted to have a backup CPAP mask for use with his CPAP machine even though plaintiff had previously gone over 3 weeks without a mask when his mask broke during use.

During that 3 week period of time plaintiff suffered untreated sleep apnea symptoms which could have resulted in his death.

Plaintiff's request for a backup CPAP mask was reasonable and a person in a similar circumstance to defendant Farhat would have made the medical order so as to protect plaintiff's health and life.

(14)

Complaint

1 Defendant Farhat's inaction in the face of
2 risk presented to him constituted Abandoning
3 plaintiff, providing no medical care at all, and
4 failing to protect plaintiff from a known
5 and obvious risk.
6
7

8 For the deliberate indifference to a prisoner's
9 serious medical needs, plaintiff seeks \$500,000.⁰⁰
10 in compensatory damages.
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(15)

Complaint

CLAIM III ~~RESTATEMENT~~

plaintiff sues defendant Alex Farhat in his individual capacity for violating plaintiff's rights to decent and adequate medical care under the Eighth Amendment to the United States Constitution.

Plaintiff complained that the prison did not replace the disposable filters for plaintiff's prescribed CPAP machine in accordance with the manufacturer's instructions. The maker stated the filters must be replaced every 30 days. The prison would only replace one every 180 days.

Plaintiff informed defendant Farhat that the disposable filter became clogged and dark in color from absorption of dust, mites, and other particulates. Defendant Farhat denied plaintiff's request.

CLAIM III continued

Plaintiff suffers from multiple serious lung diseases as well as sleep apnea, And defendant Farhat was aware of this, as well as the facts that the CPAP machine pumped air into plaintiff's lungs continuously during use, and that the machine utilized filters which had to be changed regularly or harm to the patient could result. Plaintiff coughs hundreds of times daily.

~~Defendant~~ Defendant Farhat's inaction in the face of an obvious threat to plaintiff's health constituted ~~abandoning~~ ^{Abandoning} plaintiff, providing no medical care at all, and failing to protect plaintiff from a known and obvious risk.

For deliberate indifference to a prisoner's serious health needs, plaintiff seeks \$10,000. ⁰⁰ in compensatory damages.

(17)

Complaint

CLAIM IV

Plaintiff sues Alex Farhat in his individual capacity for violating plaintiff's rights under the Eighth Amendment to the United States Constitution.

defendant Farhat, without medical justification, secretly changed plaintiff's status from totally disabled to Light Duty, resulting in plaintiff being assigned to a Building Porter [JANITOR] job which hurts him: porters are expected to clean dust and use chemicals which are violative of plaintiff's long-standing medical orders. Plaintiff faces disciplinary charges for refusing to work in the harmful environmental conditions.

Plaintiff seeks \$500,000.00 in compensatory damages.

CLAIM IV

Plaintiff sues defendant Farhat for violating his rights under the Eighth Amendment to the United States Constitution.

Defendant Farhat secretly and without medical justification removed plaintiff's single-cell status even though plaintiff continues to suffer the exact same diseases and symptoms which caused plaintiff's placement on that status.

Defendant Farhat, in opposition to plaintiff's diagnosed hypersensitivity to chemicals and even with the knowledge that plaintiff's pending visit with a specialist has been repeatedly cancelled due to the covid-crisis, exposes plaintiff to the known and obvious risk of being housed (again) in dorms, which is where he was housed when diagnosed.

(19)

Complaint

1 During a medical visit plaintiff reminded
2 defendant Farhat that in all dorms the
3 prisoners possess and use chemicals including
4 bleach, that employee-cleaners clean all the
5 dorms with chemicals which are harmful to
6 plaintiff, and that the dust from the
7 other prisoner's unwashed blankets hurt
8 plaintiff, as did their use of talcum
9 or baby powder, which plaintiff also
10 had a medical warning not ~~to~~ to be
11 exposed to.
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16

17 Defendant Farhat refused to reinstate
18 plaintiff's single-cell status, abandoning
19 him, leaving him in a zone of danger
20 medically.
21
22

23 Plaintiff seeks \$500,000.⁰⁰ in
24 compensatory damages.
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28

(20)

Complainant

CLAIM VI

Plaintiff sues defendant Farhat in his individual capacity for violating plaintiff's rights under the Eighth Amendment to the United States Constitution.

On a totality of circumstances theory, plaintiff alleges defendant Farhat violated his Eighth Amendment rights when he refused to provide decent and adequate medical care to plaintiff as outlined in CLAIMS II - V herein.

A) Defendant Farhat cruelly denied plaintiff's request that he be permitted to have a "back up" CPAP mask, since there is a history of the cheap, plastic masks the CBER purchases, breaking during normal use. When a CPAP mask breaks, plaintiff would be deprived of the only treatment he receives for sleep apnea, a deadly disease if left untreated. Due to the last breakage, plaintiff had no sleep apnea treatment for 3 weeks.

(21)

Complaint

1 B) Defendant ~~FARHAT~~ cruelly denied plaintiff's
2 pleas that the disposable filter used by his
3 CPAP machine be replaced in accordance with
4 the User Manual provided to plaintiff by the
5 medical staff.
6
7

8
9 Whereas the User Manual specifies the
10 filter must be changed after 30 nights use,
11 the prison only replaces it after 180 nights
12 use; the filter is clogged with dust and
13 mites (microscopic animals), dirt and other
14 particulate matter. (Plaintiff has studied sciences).
15
16
17
18

19 The danger to plaintiff is that while he
20 is unconscious the CPAP machine pumps
21 air from the prison's atmosphere directly
22 into plaintiff's lungs. Plaintiff suffers
23 from multiple lung diseases, each could
24 become deadly. Plaintiff must get on
25
26
27
28
(22)

Complaint

1 the floor of his cell, on his hands and knees,
2 and cough up copious amount of mucous,
3 mucous plugs, and phlegm already due to
4 the severe emphysema (COPD) he suffers.
5

6
7 Plaintiff requires powerful, even dangerous
8 medications, has suffered 2 lung operations
9 to help him breath. For defendant Farhat
10 to abandon plaintiff to breathing in
11 dirty, infected air every night is shocking.
12
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16

17 c) Defendant Farhat, despite knowledge that
18 plaintiff was sent to CHCF for a higher
19 level of care due to the severity of his
20 diseases, secretly and medically unjustifiedly
21 changed plaintiff's work status from
22 totally disabled to light duty.
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1 Defendant Farhat Knew that this change
2 in status would cause plaintiff to be assigned
3 to a job at a time when reporting to any
4 job was beyond plaintiff's abilities and
5 would be dangerous to his health.
6
7

8 Plaintiff informed defendant FARHAT that
9 he had subsequently been assigned to a job as
10 a Building Porter and that he was required
11 to sweep dust, collect dust, dump trash cans
12 and clean with chemicals in violation of
13 his existing medical orders. Defendant
14 Farhat cruelly refused to have plaintiff
15 removed from the job which hurt him
16 or to return him to totally disabled
17 status which would protect him from harm.
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25 D) Defendant Farhat secretly and with no valid
26 medical justification removed plaintiff's
27
28

(24)

Complaint

1 Single-cell status even though plaintiff still
2 suffered from the debilitating medical conditions
3 which caused him to be placed on that status
4 to protect his health. Plaintiff has existing
5 medical orders to avoid dust, chemicals and
6 talcum / baby powder. Upon being moved to a
7 dorm plaintiff will immediately be subjected
8 to dust, chemicals and powders.
9
10
11
12

13 Plaintiff pleaded with the defendant that
14 the other prisoners are permitted to use
15 chemicals, detergents, baby powder. The other
16 prisoners do not turn their dusty blankets in
17 for laundering and they produce a cloud of
18 dust with every movement of the prisoners.
19
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23

24 Plaintiff pleaded with the defendant
25 that the specialists he has seen (even
26 recently) recommended he be single-celled.
27
28 (25)

Complaint

1 Plaintiff even complained to defendant
2 that other prisoners messed with, tampered
3 with, or threatened to sabotage plaintiff's
4 CRAP machine. Plaintiff requires usage
5 of the CRAP every night, or, as the medical
6 reports by other staff prove by computer printout,
7 plaintiff is "100% compliant" with treatment.
8 Defendant cruelly refused to reinstate the
9 plaintiff's single-cell status, leaving him in
10 fear of any moment being moved to a dorm which
11 is routinely cleaned by state employees with the
12 chemicals plaintiff knows by history hurt him.
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21 E) Defendant Farhat consistently makes decisions
22 which are contrary to the decisions of plaintiff's
23 doctors at the other prisons, and even doctors
24 here at CHCF, harming plaintiff's health.
25
26
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28

(26)

Complaint

1 F) Since plaintiff began filing grievances against
2 defendant FARHAT, the defendant mysteriously
3 failed to see plaintiff for his monthly
4 appointments. Doctors plaintiff had never
5 been seen by and were unfamiliar with his
6 case showed up - only on that one day -
7 to see plaintiff. Plaintiff received no care
8 whatsoever from those stand-in doctors.
9
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13

14 G) Plaintiff's care has seriously faltered since
15 being assigned to defendant FARHAT. Plaintiff
16 developed yet another bout of pneumonia under
17 defendant FARHAT's poor care. Plaintiff is now
18 confined inside a special medical cell with
19 special air handling abilities so other prisoners
20 are protected from plaintiff's poor health.
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24

25 Plaintiff seeks 1,000,000.00 in compensatory
26 damages from defendant FARHAT.
27
28

Complaint

(27)

EXHAUSTION OF ADMINISTRATIVE REMEDIES

In accordance with the California Code of Regulations, Title 15, Division 3, § Article 5, plaintiff filed Inmate Health Care grievances as to each claim herein. Each grievance was denied at the highest level of review:

#CHCF HC 19002874, denied April 10, 2020.

#CHCF HC 2000555, denied July 1, 2020.

#CHCF HC 2000725, denied July 9, 2020.

#CHCF HC 2000175, denied September 22, 2020

#CHCF HC 20001456, (1456) denied November 19, 2020.

Defendants may access these grievances by reviewing plaintiff's electronically-stored prison file.